Remarks

Status of the Claims

Claims 1-40 are pending in the application, of which claims 1-19 stand rejected and claims 20-40 are withdrawn from consideration. By this paper, claims 1, 4, 10, 11, and 13-19 have been amended. Claim 12 has been canceled.

To advance the prosecution of the application, withdrawn claims 20-40 have been canceled without prejudice or disclaimer. The applicant reserves the right to pursue the non-elected claims in one or more divisional applications.

For the reasons set forth below, the applicant submits that each of the pending claims is patentably distinct from the cited prior art and in condition for allowance. Reconsideration of the claims is therefore respectfully requested.

Section 101 Rejection

Claims 10-19 stand rejected under 35 U.S.C. § 101 as being allegedly directed to non-statutory subject matter. Claim 10 has been amended to recite "an interpreter **stored in a computer-readable medium**" and is therefore believed to be statutory. See *Interim Guidelines* at page 50.

Section 103 Rejection

Claims 1-19 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent No. 6,513,059 to Gupta in view of U.S. Patent No. 6,487,566 to Sundaresan. This rejection is respectfully traversed. As set forth below,

7

the applicant respectfully submits that each of the pending claims is patentably distinct from the cited references, individually and collectively.

Gupta does not disclose or suggest the process recited in claim 1 for "executing an application servo" using a "context tree." The meaning of "context" in Gupta is "based on the definition of 'context' as an instance of some concept at a specified time and/or place, or concept snapshot, shared on the Internet by software agents collaborating in some problem domain." Column 5, lines 9-12. "A context node models life in a changing environment." Column 5, line 53. "In an Awit Space, a context node models life and a changing environment." Column 10, lines 34-35. "A context node and its knowledgebase represents an Awit's understanding of the world, or context (an instance of concept in time and space) from the perspective of the subscribed node at a moment in time." Column 5, lines 55-58. "A context tree models a problem domain where concept details evolve from the root node to a concept sub-trees and eventually to leaf nodes." Column 12, lines 5-7.

By contrast, the word "context" in the current application means "a current internal evaluation state of the process." Thus, Gupta's "context" is a representation of knowledge, whereas, in the current application, it is a specific means of processing knowledge, as fully described in the application. Accordingly, it is not logical for the process described in claim 1 to apply to a "context" as defined by Gupta. Neither is the process of claim 1 disclosed by Gupta using any other terminology.

The Examiner concedes that Gupta alone fails to satisfy each of the limitations in the pending independent claims, but suggests that Sundaresan discloses what Gupta lacks—*i.e.*, "selection of a node based on a matching criteria." Office Action at page 4.

8

As amended, claim 1 recites the further steps of:

> responsive to changes to the datasource, marking dependent contexts as unverified;
> choosing a marked context of the context tree;
> executing an instruction of the servo associated with the chosen context;
> responsive to said executing step, creating zero or more new child contexts in the context tree, and removing or modifying zero or more existing child contexts;
> unmarking the chosen context and marking zero or more dependent contexts as unverified; and ·
> repeating said choosing, executing, creating, removing, modifying, unmarking and marking steps over subsequent instructions of the servo until no contexts are left marked.

Sundaresan does not disclose or suggest marking dependent contexts as unverified (responsive to changes to the datasource). Furthermore, Sundaresan does not disclose choosing a marked context of the context tree or executing an instruction of the servo associated with the chosen context. Moreover, Sundaresan does not disclose or suggest creating zero or more new child contexts in the context tree, and removing or modifying zero or more existing child contexts. Finally, Sundaresan does not disclose or suggest unmarking the chosen context and marking zero or more dependent contexts as unverified, and repeating the choosing, executing, creating, removing, modifying, unmarking and marking steps over subsequent instructions of the servo until no contexts are left marked. These limitations are completely absent in Sundaresan.

A rejection based on prior art – whether grounded in anticipation or obviousness – must account for each and every claim limitation. *Celeritas Techs. Inc. v. Rockwell Int'l Corp.*, 150 F.3d 1354, 1360, 47 U.S.P.Q.2d 1516, 1522 (Fed. Cir. 1998) (anticipation); *In re Wilson*, 424 F.2d 1382, 1385, 165 U.S.P.Q.2d 494, 496 (CCPA 1970) (obviousness); MPEP § 2143.03 ("To establish *prima facie* obviousness of a

9

claimed invention, all the claim limitations must be taught or suggested by the prior art.") (emphasis added). Accordingly, the applicant respectfully submit that claim 1, as amended, is patentably distinct over the cited references, alone or in combination.

Independent claim 10 has been amended to include the limitations of claim 12, *i.e.,* "opportunity rules to realize automatic extension or integration of servos through opportunity-based linking of an interface component representing an instance of a schema fragment to a template."

Gupta discloses the ability to distribute updates and extensions. By contrast, the claimed invention recites "opportunity rules" to realize automatic extension or integration of servos. An opportunity is defined as "an association between a unit of schema and a view or other action that can provide a means to interact with, modify, or apply an operation to, and instance of that same schema." See application at [0189]-[0196]. An opportunity enables separately authored servos to provide a unified end-user experience. As such, it is not merely a means to distribute updates. It enables, for example, servos that were written without knowledge of each other to seamlessly extend each other. Gupta does not disclose or suggest a type of rule which achieves this end. Therefore, Gupta does not disclose or suggest anything remotely similar to the claimed "opportunity rules."

Similarly, Sundaresan does not disclose or suggest "opportunity rules to realize automatic extension or integration of servos through opportunity-based linking of an interface component representing an instance of a schema fragment to a template." Accordingly, the applicant respectfully submits that claim 10, as amended, is patentably distinct over the cited references, alone or in combination.

10

Conclusion

For at least the foregoing reasons, the cited prior art references, whether considered individually or in combination, fail to disclose each of the limitations in any of the pending independent claims. For at least the same reasons, each of the claims depending therefrom are also patentably distinct from the cited prior art.

In view of the foregoing, all pending claims represent patentable subject matter. A Notice of Allowance is respectfully requested.

Respectfully submitted,

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11